

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF	)	
JURISDICTIONAL STATUS OF LINDSEY	)	CASE NO.
ENTERPRISES, LLC AND OF ITS COMPLIANCE	)	2023-00207
WITH KRS CHAPTER 278, 807 KAR CHAPTER	)	
005, AND 49 CFR PARTS 191 AND 192	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO LINDSEY ENTERPRISES, LLC

Lindsey Enterprises, LLC (Lindsey Enterprises), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 26, 2024. The Commission directs Lindsey Enterprises to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Lindsey Enterprises shall make timely amendment to any prior response if Lindsey Enterprises obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Lindsey Enterprises fails or refuses to furnish all or part of the requested information, Lindsey Enterprises shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Lindsey Enterprises shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Lindsey Enterprises' response to Commission Staff's First Request for Information (Staff's First Request), Item 8. State whether the Diversified line referenced is within  $\frac{1}{2}$  air mile of the Fords Branch customers. If not, explain how Diversified, as a farm tap system, could provide service to these customers.

2. Refer to Lindsey Enterprises' response to Staff's First Request, Item 11. Explain why the Fords Branch bills are spread over multiple wells, instead of the one for the Charles Soward's well.

3. Refer to Lindsey Enterprises' response to Staff's First Request, Item 14, which references the response to Item 10. Item 10 does not state whether the distance of the customers from Lindsey Enterprises' line is less than ½ air mile. Provide the distance of the nearest Fords Branch customers from the Lindsey Enterprises line that is tapped to serve them.

4. Refer to Lindsey Enterprises' response to Staff's First Request, Item 19. Confirm that, if Lindsey Enterprises discontinues gas service to Fords Branch, Lindsey Enterprises will continue to provide gas to Diversified from the Charles Soward's well using the line that is currently tapped for the Fords Branch customers.

5. Refer to Lindsey Enterprises' response to Staff's First Request, Item 10, Affidavit of Curtis Ratliff, at paragraph no. 4.

a. Provide the date on which each meter for a home or structure referred to therein was installed.

b. State the date on which each meter for a home or structure referred to therein was first utilized for billing.

6. Refer generally to Lindsey Enterprises' response to Staff's First Request, Item 10, Affidavit of Curtis Ratliff. Provide a list identifying all repairs conducted by Lindsey Enterprises for the accounts listed below, briefly describing each repair, and providing the cost of each repair. As part of the answer include all receipts for and written communications related to each repair.

- a. 104;
- b. 105;
- c. 109;
- d. 119;
- e. 124;
- f. 125;
- g. 142;
- h. 114;
- i. 115;
- j. 128;
- k. 112; and
- l. 123.

7. Refer to Lindsey Enterprises' response to Staff's First Request, Item 16.

a. Provide the installation date of all current residential and structure meters.

b. State whether Lindsey Enterprises or another organization installed the meters, and if Lindsey Enterprises installed the meters, provide all documentation and receipts associated with the meter installation.

c. Provide all documentation and receipts for any repairs done to the current residential and structure meters.

8. State which organizations or individuals Lindsey Enterprises has contacted in the last five years about taking over service of the Fords Branch customers. Provide

as part of the answer all communications between Lindsey Enterprises and any such organization or individual.

9. Provide a detailed estimate of the cost to repair the any pipes, meters, or other equipment in the Fords Branch neighborhood.

10. Provide a detailed estimate of the costs that would be involved for each Fords Branch customer to install a propane tank and the expected annual cost of deliveries of propane for the Fords Branch customers.

11. Refer to Lindsey Enterprises' response to Staff's First Request, Item 8. Provide a detailed estimate of the costs that would be incurred by the Fords Branch customers to install lines which would connect to the Diversified owned pipeline.

12. Refer to Lindsey Enterprises' response to Staff's First Request, Item 8. For each Fords Branch account, state whether a line leading from each Ford's Branch customer would be within one-half air mile of the Diversified pipeline identified as a potential alternative energy source.

13. Provide a detailed estimate of the costs that would be involved for each Fords Branch customer to transition to electricity and connect to the Kentucky Power system.

14. Provide a detailed estimate of the costs that would be involved for each Fords Branch customer to repair all current infrastructure required to provide safe farm tap service.



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DATED APR 08 2024

cc: Parties of Record

Case No. 2023-00207

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